



MEMO ENDORSED

GEORGIA PESTANA
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LAW DEPARTMENT**
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June 9, 2021

BY ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Christopher Wallace v. New York City Department of Education
20 Civ. 01424 (KPF)

Dear Judge Failla:

I am an Assistant Corporation Counsel in the office of Georgia Pestana, Acting Corporation Counsel of the City of New York, attorney for defendant New York City Department of Education ("DOE") in the above-referenced case. I write, to request a one-week extension of time, from June 11, 2021 to June 18, 2021, for defendant to serve and file its reply to plaintiff's opposition to defendant's motion for summary judgment. Defendant previously requested, and the Court granted, an extension of time from May 21, 2021 to June 11, 2021 for defendant to serve and file its reply. I attempted to reach plaintiff's counsel by phone twice, once on June 8th and once on June 9th, but have not received a response as to whether he consents to this request.

This adjournment is necessary because, as has been widely reported, our office has had a complete loss of technological access and resources. In particular, over the past weekend, access to the New York City Law Department's network and emails was completely disabled and, unfortunately, full access has not yet been restored. Accordingly, I have not been able to work on the reply since Friday as I do not have access to my work product, relevant documents, or emails. Therefore, defendant respectfully requests a one-week extension of time to serve and file its reply.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Laura C. Williams
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

Application GRANTED.

Dated: June 9, 2021
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE